

**UNITED STATES BANKRUPTCY COURT**  
**MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Donald Jacob Burrs, Jr. a/k/a Donald Jacob Burrs <b>Debtor 1</b> Joyce Melinda Burrs <b>Debtor 2</b>	<b>Chapter 13</b>
Exeter Finance <b>Movant(s)</b> v. Donald Jacob Burrs, Jr. a/k/a Donald Jacob Burrs Joyce Melinda Burrs <b>Respondent(s)</b> Jack N. Zaharopoulos, Esquire Standing Chapter 13 Trustee <b>Additional Respondent</b>	<b>Case No.</b> 1:22-BK-02516-HWV <b>Matter:</b> Motion for Relief from the Automatic Stay <b>Document No.</b> 73

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Donald Jacob Burrs, Jr. and Joyce Melinda Burrs, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 2; therefore, it is denied.
3. Upon information and belief, the averments as stated in Paragraph 3 are admitted.
4. Upon information and belief, the averments as stated in Paragraph 4 are admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
5. Paragraph 5 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: May 1, 2024

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
PA ID No. 201207

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Camp Hill, PA 17011  
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*Attorney for Debtor(s)*

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MIDDLE DISTRICT OF PENNSYLVANIA

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Donald Jacob Burrs, Jr.  
a/k/a Donald Jacob Burrs

**Debtor 1**

Joyce Melinda Burrs

**Debtor 2**

Exeter Finance

**Movant(s)**

v.

Donald Jacob Burrs, Jr.

a/k/a Donald Jacob Burrs

Joyce Melinda Burrs

**Respondent(s)**

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

**Additional Respondent**

**Chapter 13**

**Case No.** 1:22-BK-02516-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 73

**CERTIFICATE OF SERVICE**

I hereby certify that on Wednesday, May 1, 2024, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

William Craig, Esquire  
Eisenberg Gold & Agrawal & Craig  
1040 Kings Highway North, Suite 200  
Cherry Hill, NJ 08034  
*Counsel for Movant(s)*

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Sylvia H. Rambo United States Courthouse  
1501 North Sixth Street, Floor 3  
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire